

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WATER GREMLIN COMPANY, et al.,¹

Debtors.

Chapter 11

Case No. 23-11775 (LSS)

(Jointly Administered)

**AMENDED² NOTICE OF AGENDA FOR MATTERS SCHEDULED FOR
HEARING ON JUNE 3, 2025, AT 2:00 P.M. (ET)³**

This hearing will be conducted in-person, any exceptions must be approved by chambers. Parties may observe the hearing remotely by registering with the Zoom link below no later than June 2, 2025 at 4:00 p.m. (prevailing Eastern Time).

To attend a hearing remotely, please register using the eCourtAppearance tool ([available here](#)) or on the court's website at www.deb.uscourts.gov.

The deadline to register for remote attendance is 4 PM (prevailing Eastern Time) the business day before the hearing unless otherwise noticed.

After the deadline has passed an electronic invitation, with the relevant audio or video link, will be emailed to you prior to the hearing.

RESOLVED MATTERS

1. *Debtors' First (Substantive) Omnibus Objection to Certain Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1 [Docket No. 686, 4/14/2025]*

Response Deadline: May 16, 2025 at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: WG Sub, LLC ("WG Sub") (0781), Water Gremlin Holdings, Inc. ("Holdings") (9250), and Water Gremlin Company ("Water Gremlin") (6396).

² **Amended items appear in bold.**

³ Copies of all petitions, motions, and pleadings identified herein may be obtained free of charge through the website of the Debtors' proposed claims and noticing agent at: <https://cases.stretto.com/WaterGremlin>

- a) *Certificate of No Objection Regarding Debtors' First (Substantive) Omnibus Objection to Certain Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1* [Docket No. 734, 5/20/2025]
- b) *Order Sustaining Debtors' First (Substantive) Omnibus Objection to Certain Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1* [Docket No. 743, 5/27/2025]

Status: An order has been entered. No hearing is required.

2. *Debtors' Substantive Objection to Claim No. 229 of Kurt Gifford* [Docket No. 688, 4/14/2025]

Response Deadline: May 16, 2025 at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- a) *Certificate of No Objection Regarding Debtors' Substantive Objection to Claim No. 229 of Kurt Gifford* [Docket No. 735, 5/20/2025]
- b) *Order Sustaining Debtors' Substantive Objection to Claim No. 229 of Kurt Gifford* [Docket No. 744, 5/28/2025]

Status: An order has been entered. No hearing is required.

ADJOURNED MATTERS

3. *Debtors' Second (Substantive) Omnibus Objection to Certain Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1* [Docket No. 687, 4/14/2025]

Response Deadline: May 16, 2025 at 4:00 p.m. (ET)

Responses Received: See Schedule A, attached.

- a) *Response by RoofCare Service Center, LLC to: Debtors' Second (Substantive) Omnibus Objection to Certain Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1* [Docket No. 728; 5/14/2025]
- b) *Exhibit(s) A to Response by RoofCare Service Center, LLC to: Debtors' Second (Substantive) Omnibus Objection to Certain Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1* [Docket No. 730; 5/14/2025]

Related Documents:

- c) *Certification of Counsel Submitting Revised Proposed Order Sustaining Debtors' Second Omnibus Objection to Claims (Substantive)* [Docket No. 736, 5/20/2025]

Status: With respect only to the claim of RoofCare Service Center, LLC [Nations Roof] [Claim No. 21, Case No. 21-11775], this matter has been adjourned to the omnibus hearing on July 29, 2025 at 10:00 a.m. (ET). A certification of counsel submitting a revised proposed order granting the objection with respect to other claims that are the subject of the objection has been filed. No hearing is required unless the Court has any questions.

4. *Debtors' Substantive Objection to Claim Nos. 227, 265 and 286 of Ramsey County Property Tax Services* [Docket No. 689, 4/14/2025]

Response Deadline: May 16, 2025 at 4:00 p.m. (ET)

Responses Received: See Schedule B, attached.

- a) *Ramsey County Property Tax Services' Response to Debtors' Substantive Objection to Claim Nos. 227, 265, and 286* [Docket No. 731; 5/15/2025]

Status: The parties have agreed to adjourn this matter to the omnibus hearing on July 29, 2025 at 10:00 a.m. (ET).

FEE APPLICATIONS GOING FORWARD UNDER CERTIFICATION OF COUNSEL

5. *Fifth Interim Fee Application of Cole Schotz P.C., Delaware Co-Counsel To The Official Committee of Unsecured Creditors, For Allowance of Compensation and Reimbursement of Expenses For The Period From November 1, 2024 Through January 31, 2025* [Docket No. 702, 4/21/2025]

Response Deadline: May 12, 2025 at 4:00 p.m. (ET)

Responses Received: No responses have been received to date.

Related Documents:

- a) *Twelfth Monthly Fee Application of Cole Schotz P.C., Delaware Co-Counsel To The Official Committee of Unsecured Creditors, For Allowance of Compensation and Reimbursement of Expenses For The Period From November 1, 2024 Through November 30, 2024* [Docket No. 634, 12/18/2024]
- b) *Certificate of No Objection Regarding Twelfth Monthly Fee Application of Cole Schotz P.C., Delaware Co-Counsel To The Official Committee of Unsecured Creditors, For Allowance of Compensation And Reimbursement of Expenses For The Period From November 1, 2024 Through November 30, 2024* [Docket No. 648, 1/9/2025]
- c) *Thirteenth Monthly Fee Application of Cole Schotz P.C., Delaware Co-Counsel To The Official Committee of Unsecured Creditors, For Allowance of Compensation and Reimbursement of Expenses For The Period From December 1, 2024 Through January 31, 2025* [Docket No. 675, 2/27/2025]

- d) *Certificate of No Objection Regarding Combined Thirteenth Monthly Fee Application of Cole Schotz P.C., Delaware Co-Counsel To The Official Committee of Unsecured Creditors, For Allowance of Compensation and Reimbursement of Expenses For The Period From December 1, 2024 Through January 31, 2025* [Docket No. 682, 3/26/2025]
- e) ***Certification of Counsel Regarding Omnibus Order Approving Fifth Interim Fee Applications*** [Docket No. 748; 5/30/2025]

Status: A certification of counsel attaching a form of proposed omnibus order has been filed. No hearing is required unless the Court has questions.

6. *Fifth Interim Application For Compensation and Reimbursement of Expenses of Province, LLC As Financial Advisor To The Official Committee of Unsecured Creditors, For The Period November 1, 2024 Through January 31, 2025* [Docket No. 703, 4/21/2025]

Response Deadline: May 12, 2025 at 4:00 p.m. (ET)

Responses Received: No responses have been received to date.

Related Documents:

- a) *Thirteenth Monthly Application For Compensation and Reimbursement of Expenses of Province, LLC As Financial Advisor To The Official Committee of Unsecured Creditors, For The Period From November 1, 2024 Through November 30, 2024* [Docket No. 628, 12/16/2024]
- b) *Certificate of No Objection Regarding Thirteenth Monthly Application For Compensation and Reimbursement of Expenses of Province, LLC As Financial Advisor To The Official Committee of Unsecured Creditors, For The Period From November 1, 2024 Through November 30, 2024* [Docket No. 645, 1/7/2025]
- c) *Fourteenth Monthly Application For Compensation and Reimbursement of Expenses of Province, LLC As Financial Advisor To The Official Committee of Unsecured Creditors, For The Period From December 1, 2024 Through December 31, 2024* [Docket No. 649, 1/15/2025]
- d) *Certificate of No Objection Regarding Fourteenth Monthly Application For Compensation and Reimbursement of Expenses of Province, LLC As Financial Advisor To The Official Committee of Unsecured Creditors, For The Period From December 1, 2024 Through December 31, 2024* [Docket No. 657, 2/6/2025]
- e) *Fifteenth Monthly Application For Compensation and Reimbursement of Expenses of Province, LLC As Financial Advisor To The Official Committee of Unsecured Creditors, For The Period From January 1, 2025 Through January 31, 2025* [Docket No. 667, 2/18/2025]
- f) *Certificate of No Objection Regarding Fifteenth Monthly Application For Compensation and Reimbursement of Expenses of Province, LLC As Financial*

Advisor To The Official Committee of Unsecured Creditors, For The Period From January 1, 2025 Through January 31, 2025 [Docket No. 677, 3/18/2025]

- g) ***Certification of Counsel Regarding Omnibus Order Approving Fifth Interim Fee Applications [Docket No. 748; 5/30/2025]***

Status: A certification of counsel attaching a form of proposed omnibus order has been filed. No hearing is required unless the Court has questions.

7. *Fifth Interim Fee Application of Brown Rudnick LLP, As Counsel For The Official Committee of Unsecured Creditors For Allowance of Interim Compensation and For Reimbursement of Disbursements Incurred For The Period From November 1, 2024 Through January 31, 2025 [Docket No. 704, 4/21/2025]*

Response Deadline: May 12, 2025 at 4:00 p.m. (ET)

Responses Received: No responses have been received to date.

Related Documents:

- a) *Twelfth Monthly Fee Application of Brown Rudnick LLP, As Counsel For The Official Committee of Unsecured Creditors For Allowance of Interim Compensation and For Reimbursement of Disbursements Incurred For The Period November 1, 2024 Through November 30, 2024 [Docket No. 629, 12/16/2024]*
- b) *Certificate of No Objection Regarding Twelfth Monthly Fee Application of Brown Rudnick LLP, As Counsel For The Official Committee of Unsecured Creditors For Allowance of Interim Compensation and For Reimbursement of Disbursements Incurred For The Period November 1, 2024 Through November 30, 2024 [Docket No. 646, 1/7/2025]*
- c) *Thirteenth Monthly Fee Application of Brown Rudnick LLP, As Counsel For The Official Committee of Unsecured Creditors For Allowance of Interim Compensation and For Reimbursement of Disbursements Incurred For The Period December 1, 2024 Through December 31, 2024 [Docket No. 656, 1/27/2025]*
- d) *Certificate of No Objection Regarding Thirteenth Monthly Fee Application of Brown Rudnick LLP, As Counsel For The Official Committee of Unsecured Creditors For Allowance of Interim Compensation and For Reimbursement of Disbursements Incurred For The Period December 1, 2024 Through December 31, 2024 [Docket No. 669, 2/19/2025]*
- e) *Fourteenth Monthly Fee Application of Brown Rudnick LLP, As Counsel For The Official Committee of Unsecured Creditors For Allowance of Interim Compensation and For Reimbursement of Disbursements Incurred For The Period January 1, 2025 Through January 31, 2025 [Docket No. 674, 2/27/2025]*
- f) *Certificate of No Objection Regarding Fourteenth Monthly Fee Application of Brown Rudnick LLP, As Counsel For The Official Committee of Unsecured Creditors For Allowance of Interim Compensation and For Reimbursement of Disbursements*

Incurred For The Period January 1, 2025 Through January 31, 2025 [Docket No. 681, 3/26/2025]

- g) ***Certification of Counsel Regarding Omnibus Order Approving Fifth Interim Fee Applications*** [Docket No. 748; 5/30/2025]

Status: A certification of counsel attaching a form of proposed omnibus order has been filed. No hearing is required unless the Court has questions.

8. *Fifth Interim Application For Compensation of Riveron RTS, LLC As Financial Advisors To The Debtors and Debtors In Possession, For The Period From November 1, 2024 Through January 31, 2025* [Docket No. 718, 5/6/2025]

Response Deadline: May 27, 2025 at 4:00 p.m. (ET)

Responses Received: No responses have been received to date.

Related Documents:

- a) *Thirteenth Monthly Fee Application of Riveron RTS, LLC As Financial Advisors To The Debtors and Debtors-In-Possession For Compensation For Professional Services Rendered and Reimbursement of Expenses Incurred For The Period From November 1, 2024 Through November 30, 2024* [Docket No. 643, 1/6/2025]
- b) *Certificate of No Objection Regarding Thirteenth Monthly Fee Application of Riveron RTS, LLC As Financial Advisors To The Debtors and Debtors-In-Possession For Compensation For Professional Services Rendered and Reimbursement of Expenses Incurred For The Period From November 1, 2024 Through November 30, 2024* [Docket No. 659, 2/10/2025]
- c) *Fourteenth Monthly Fee Application of Riveron RTS, LLC As Financial Advisors To The Debtors and Debtors-In-Possession For Compensation For Professional Services Rendered and Reimbursement of Expenses Incurred For The Period From December 1, 2024 Through December 31, 2024* [Docket No. 661, 2/11/2025]
- d) *Certificate of No Objection Regarding Fourteenth Monthly Fee Application of Riveron RTS, LLC As Financial Advisors To The Debtors and Debtors-In-Possession For Compensation For Professional Services Rendered and Reimbursement of Expenses Incurred For The Period From December 1, 2024 Through December 31, 2024* [Docket No. 714, 5/2/2025]
- e) *Fifteenth Monthly Fee Application of Riveron RTS, LLC As Financial Advisors To The Debtors and Debtors-In-Possession For Compensation For Professional Services Rendered and Reimbursement of Expenses Incurred For The Period From January 1, 2025 Through January 31, 2025* [Docket No. 715, 5/2/2025]
- f) *Certificate of No Objection Regarding Fifteenth Monthly Application Of Riveron RTS, LLC For Allowance of Compensation and Reimbursement of Expenses For The Period From January 1, 2025 Through January 31, 2025* [Docket No. 745; 5/29/2025]

- g) ***Certification of Counsel Regarding Omnibus Order Approving Fifth Interim Fee Applications*** [Docket No. 748; 5/30/2025]

Status: A certification of counsel attaching a form of proposed omnibus order has been filed. No hearing is required unless the Court has questions.

9. *Fifth Combined Monthly and Interim Application For Compensation of Dorsey & Whitney LLP As Counsel To The Debtors and Debtors In Possession, For The Period From November 1, 2024 Through January 31, 2025* [Docket No. 717, 5/6/2025]

Response Deadline: May 27, 2025 at 4:00 p.m. (ET)

Responses Received: No responses have been received to date.

Related Documents:

- a) *Certificate Of No Objection Regarding Fifth Combined Monthly And Interim Application Of Dorsey & Whitney LLP, As Counsel To The Debtors And Debtors In Possession For The Period From November 1, 2024 Through January 31, 2025* [Docket No. 746; 5/29/2025]
- b) ***Certification of Counsel Regarding Omnibus Order Approving Fifth Interim Fee Applications*** [Docket No. 748; 5/30/2025]

Status: A certification of counsel attaching a form of proposed omnibus order has been filed. No hearing is required unless the Court has questions.

MATTERS GOING FORWARD UNDER CERTIFICATION OF COUNSEL

10. *Debtors' Second (Substantive) Omnibus Objection to Certain Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1* [Docket No. 687, 4/14/2025]

Response Deadline: May 16, 2025 at 4:00 p.m. (ET)

Responses Received: See Schedule A, attached.

- a) *Response by RoofCare Service Center, LLC to: Debtors' Second (Substantive) Omnibus Objection to Certain Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1* [Docket No. 728; 5/14/2025]
- b) *Exhibit(s) A to Response by RoofCare Service Center, LLC to: Debtors' Second (Substantive) Omnibus Objection to Certain Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1* [Docket No. 730; 5/14/2025]

Related Documents:

- c) *Certification of Counsel Submitting Revised Proposed Order Sustaining Debtors' Second Omnibus Objection to Claims (Substantive)* [Docket No. 736, 5/20/2025]

Status: With respect only to the claim of RoofCare Service Center, LLC [Nations Roof] [Claim No. 21, Case No. 21-11775], this matter has been adjourned to the omnibus hearing on July 29, 2025 at 10:00 a.m. (ET). A certification of counsel submitting a revised proposed order granting the objection with respect to other claims that are the subject of the objection has been filed. No hearing is required unless the Court has any questions.

11. *Debtors' Motion For Entry Of An Order (I) Approving The Combined Disclosure Statement And Plan On An Interim Basis For Solicitation Purposes Only, (II) Scheduling A Combined Disclosure Statement Final Approval And Plan Confirmation Hearing And Setting Related Deadlines, (III) Approving (A) The Solicitation And Tabulation Procedures And (B) The Ballots, The Confirmation Hearing Notice And Related Notices And Forms, And (IV) Granting Related Relief* [Docket No. 685; 4/14/2025]

Response Deadline: April 28, 2025 at 4:00 p.m. (ET); May 30, 2025 at 4:00 p.m. (ET) with respect to the Office of the United States Trustee

Responses Received: None.

Related Documents:

- a) *First Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation of Water Gremlin Company and its Debtor Affiliates* [Docket No. 750; 5/30/2025]
- b) *Notice of Filing of Redline of First Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation of Water Gremlin Company and its Debtor Affiliates* [Docket No. 751; 5/30/2025]
- c) *Certification of Counsel Regarding Debtors' Motion For Entry of an Order (I) Approving the Combined Disclosure Statement and Plan on an Interim Basis For Solicitation Purposes Only, (II) Scheduling a Combined Disclosure Statement Final Approval and Plan Confirmation Hearing and Setting Related Deadlines, (III) Approving (A) the Solicitation and Tabulation Procedures and (B) the Ballots, the Confirmation Hearing Notice and Related Notices and Forms, and (IV) Granting Related Relief* [Docket No. 752; 5/30/2025]

Status: The Debtors and the Office of the United States Trustee have resolved the Office of the United States Trustee's comments regarding the proposed order approving the disclosure statement on an interim basis for solicitation purposes. The Debtors **submitted** a revised proposed order under certification of counsel **incorporating the Office of the United States Trustee's comments. No hearing is required unless the Court has questions.**

Dated: June 2, 2025
Wilmington, Delaware

DORSEY & WHITNEY (DELAWARE)

/s/ Alessandra Glorioso

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SCHEDULE A

Summary of Responses to Debtors' Second (Substantive) Omnibus Objection to Certain Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1 [Docket No. 687]

	RESPONSES	STATUS
NO RESPONSES		
Applies Automation, Inc.		A certification of counsel has been submitted with a proposed order granting the objection with respect to these claims.
McMaster-Carr Supply Company		
Midland Paper Company		
Northern States Filtration Co.		
Service Plus Logistics		
Service Plus Transport		
WestRock Container, LLC		
WestRock CP, LLC		
NHA Heating and Air Conditioning, Inc.		
UHL Company, Inc.		
FORMAL RESPONSES		
RoofCare Service Center, LLC [Nations Roof]		Adjourned to omnibus hearing on July 29, 2025 at 10:00 a.m. (ET)

SCHEDULE B

Summary of Responses to Debtors' Substantive Objection to Claim Nos. 227, 265 and 286 of Ramsey County Property Tax Services [Docket No. 689]

	RESPONSES	STATUS
INFORMAL RESPONSES		
Ramsey County Property Tax, Records & Election Services		Adjourned to omnibus hearing on July 29, 2025 at 10:00 a.m. (ET)
Ramsey County Property Tax, Records & Election Services		
Ramsey County Tax Services		